

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, et al.,	)	
	)	
Plaintiffs,	)	
	)	
and	)	
	)	
UNITED STATES OF AMERICA,	)	Civil Action No. 4:65-cv-01300-HTW-LRA
	)	1300(E)
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
MERIDIAN MUNICIPAL SEPARATE	)	
SCHOOL DISTRICT, et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF JOHN S. CUSICK**

JOHN S. CUSICK declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am over the age of 18 years old and competent to make this declaration. I am an attorney with the NAACP Legal Defense & Educational Fund, Inc. (“LDF”), am admitted to practice law in all of the courts of the State of New York and have been admitted to appear as counsel *Pro Hac Vice* for Private Plaintiffs John Barnhardt, *et al.*, (collectively “Plaintiffs”) in the above-captioned matter. I submit this declaration on behalf of Plaintiffs to provide the Court true and correct copies of certain documents submitted in connection with Private Plaintiffs’ Reply in Support of the Motion of the Motion to Re-Depose an Unprepared 30(b)(6) Witness.

2. A true and correct copy of email correspondence between Louis Fisher et al., LDF, Counsel for Plaintiffs, and John Hooks et al., Counsel for Defendant Meridian Public School District (“District”), dated November 21, 2018, is attached hereto as Exhibit 1.

3. A true and correct copy of an email and attachment from Jaime Dole, on behalf of Counsel for District, to Louis Fisher et al., LDF, Counsel for Plaintiffs, and Aria Vaughn et al., Counsel for Plaintiff-Intervenor the United States, dated November 16, 2018, is attached hereto as Exhibit 2.

Dated: November 28, 2018

/s/ John S. Cusick  
John S. Cusick  
NAACP Legal Defense and  
Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, New York 10006  
Tel: (212) 965-2200  
Fax: (212) 226-7592  
jcusick@naacpldf.org